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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JUAN CARLOS RUIZ JR,
ANGEL SANCHEZ,
SOSTENES QUINTERO LOPEZ,
JAVIER ALFONSO LOPEZ LOPEZ,
CARLOS ERNESTO FRANCO SARABIA

Defendants.

CASE NO. 1:22-CR-00267-JLT-SKO

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER

DATE: 8/16/2023

TIME: 1:00 p.m.

COURT: Hon. Sheila K. Oberto

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status conference on 8/16/2023.
2. By this stipulation, defendant now moves to continue the status conference until 11/15/2023, and to exclude time between 8/16/2023, and 11/15/2023, under 18 U.S.C. § 3161(h)(7)(A), B(ii) [Local Code T4].
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes wiretap recordings, thousands of pages of investigative reports, video, audio recordings,

1 cell phone extractions, and other voluminous materials. On or about January 13, 2023, the
2 government produced approximately 430 GBs of supplemental discovery.

3 b) Counsel for defendants desire additional time to consult with their clients, review
4 the voluminous discovery, conduct independent investigation, and pursue a potential pretrial
5 resolution of the case.

6 c) Counsel for defendants believe that failure to grant the above-requested
7 continuance would deny him/her the reasonable time necessary for effective preparation, taking
8 into account the exercise of due diligence.

9 d) The government does not object to the continuance.

10 e) Based on the above-stated findings, the ends of justice served by continuing the
11 case as requested outweigh the interest of the public and the defendant in a trial within the
12 original date prescribed by the Speedy Trial Act.

13 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
14 et seq., within which trial must commence, the time period of 8/16/2023 to 11/15/2023,
15 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(ii) [Local Code T4]
16 because it is so unusual or so complex, due to the number of defendants, the nature of the
17 prosecution, or the existence of novel questions of fact or law, that it is unreasonable to expect
18 adequate preparation for pretrial proceedings or for the trial itself within the time limits
19 established by this section.

20 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
21 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
22 must commence.

23 IT IS SO STIPULATED.
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1 Dated: August 7, 2023

PHILLIP A. TALBERT
United States Attorney

2
3 /s/ ANTONIO J. PATACA
ANTONIO J. PATACA
Assistant United States Attorney

4 Dated: August 7, 2023

5 /s/ MARK COLEMAN
MARK COLEMAN
Counsel for Defendant
JUAN CARLOS RUIZ

6
7 Dated: August 7, 2023

8 /s/ PETER JONES
PETER JONES
Counsel for Defendant
ANGEL SANCHEZ

9
10 Dated: August 7, 2023

11 /s/ HRISTO K. BIJEV
HRISTO K. BIJEV
Counsel for Defendant
SOSTENES QUINTERO
LOPEZ

12 Dated: August 7, 2023

13 /s/ GERONIMO GUTIERREZ
GERONIMO GUTIERREZ
Counsel for Defendant
JAVIER ALFONSO LOPEZ
LOPEZ

14
15 Dated: August 7, 2023

16 /s/ ROGER WILSON
ROGER WILSON
Counsel for Defendant
CARLOS ERNESTO FRANCO
SARABIA

ORDER

IT IS SO ORDERED.

DATED: 8/10/2023

Sheila K. Oberto

THE HONORABLE SHEILA K. OBERO
UNITED STATES MAGISTRATE JUDGE